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GOVERNOR

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
200 FAIR OAKS LANE
FRANKFORT, KENTUCKY 40601-1190
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LEONARD K. PETERS
SECRETARY

FACT SHEET

**KENTUCKY POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT TO DISCHARGE TREATED WASTEWATER
INTO WATERS OF THE COMMONWEALTH**

KPDES No.: KY0099325 Permit Writer: Mahmoud Sartipi Date: March 9, 2009
AI No.: 3046

1. **SYNOPSIS OF APPLICATION**

a. Name and Address of Applicant

James Marine, Inc.
c/o Ronald James
P.O. Box 2305
Paducah, Kentucky 42002-2305

b. Facility Location

James Marine, Inc. - Paducah River Service
4500 Clarks River Road
Paducah, McCracken County, Kentucky 42003

c. Description of Applicant's Operation

Shipbuilding and repair

d. Production Capacity of Facility

Not applicable

e. Description of Existing Pollution Abatement Facilities

Outfall 001 - Wash water from dry cargo barge cleaning are treated through sedimentation prior to discharge.

Outfall 004 - Bilge water is treated through sedimentation prior to discharge. Outfalls 002 and 003 were eliminated before the previous permit action.

f. Permitting Action

This is a reissuance of a minor individual KPDES permit to an existing shipbuilding and repair facility (SIC 3731).

2. **RECEIVING WATERS**

a. Receiving Water Name

Outfalls 001 and 004 - discharge to Tennessee River between mile points 4.9 and 5.2.

b. Stream Segment Use Classifications

The Tennessee River is classified as Warmwater Aquatic Habitat, Primary/Secondary Contact Recreation, and Domestic Water Supply.

c. Stream Segment Antidegradation Categorization

High Quality Water

d. Stream Low Flow Condition

At the point of discharge, the 7Q10 and the Harmonic Mean for the Tennessee River are 5,000 and 43,800 cfs, respectively.

At Paducah Water Works intake, the nearest downstream public water supply, the 7Q10 and the Harmonic Mean for the Ohio River are 51,000 and 175,000 cfs, respectively.

3. REPORTED DISCHARGE AND PROPOSED LIMITS

Description of Discharge - Outfall 001 - Wash water from dry cargo barge cleaning and repair

Effluent Characteristics	Reported Discharge		Proposed Limits		Applicable Water Quality Criteria and/or Effluent Guidelines
	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	
Flow (MGD)	0.044	0.11	Report	Report	401 KAR 5:065, Section 2(8)
Total Organic Carbon (mg/l)	6.69	41	Removing from permit		401 KAR 5:080, Section 1(2)(c)2
Chemical Oxygen Demand (mg/l)	NA	NA	Removing from permit		401 KAR 5:080, Section 1(2)(c)2
Chlorides (mg/l)	31.25	1100	Removing from permit		401 KAR 5:080, Section 1(2)(c)2
Ammonia, (as mg/l N)	0.98	2.85	Removing from permit		401 KAR 5:080, Section 1(2)(c)2
BOD ₅ (mg/l)	NA	NA	Report	Report	401 KAR 5:065, Section 2(8)
Phosphorus (mg/l)	0.25	0.75	Report	Report	401 KAR 5:065, Section 2(8) 401 KAR 5:065, Section 2(12)
Hydrogen Sulfide (undissociated)	0.56	11.4	0.002	Report	401 KAR 10:031, Section 6 401 KAR 5:065, Section 2(12)
Oil & Grease (mg/l)	5.13	9	10	15	401 KAR 5:080, Section 1(2)(c)2
Total Suspended Solids (mg/l)	14.68	120	30	45	401 KAR 5:080, Section 1(2)(c)2
Total Recoverable Iron (mg/l)	0.701	3.26	3.5	4.0	401 KAR 5:065, Section 2(12) 401 KAR 10:031, Section 6
pH (min/max)	7.16	11.6	6.0 (min)	9.0 (max)	401 KAR 10:031, Section 4(1)(b)
NA Not Available					

4. **METHODOLOGY USED IN DETERMINING LIMITATIONS**

a. Serial Number

001 - Wash water from dry cargo barge cleaning and repair

b. Effluent Characteristics

Biochemical Oxygen Demand	Phosphorus	pH
Total Suspended Solids	Oil & Grease	Flow
Hydrogen Sulfide	Iron, Total Recoverable	

c. Pertinent Factors

None

d. Monitoring Requirements

Instantaneous flow measurements shall be collected once per Month.

Biochemical Oxygen Demand (5-day), Total Suspended Solids, Oil & Grease, Hydrogen Sulfide, Iron (TR), Phosphorus, and pH shall be monitored once per month by grab sample.

e. Justification of Limits

The Kentucky Administrative Regulations (KARs) cited below has been duly promulgated pursuant to the requirements of Chapter 224 of the Kentucky Revised Statutes (KRSs).

Flow, Phosphorus and Biochemical Oxygen Demand (5 day)

The monitoring requirements for these parameters are consistent with the requirements of 401 KAR 5:065, Section 2(8).

Total Recoverable Iron, Hydrogen Sulfide and pH

The limits for these parameters are consistent with the requirements of 401 KAR 10:031, Section 6 and 401 KAR 10:031, Section 4(1)(b).

Oil & Grease and Total Suspended Solids

The limits and requirements for these parameters are consistent with the requirements of 401 KAR 5:080, Section 1(2)(c)2. These limits are representative of the Division of Water's "Best Professional Judgment" (BPJ) determination of the "Best Practicable Control Technology Currently Available" (BPT) and "Best Available Technology Economically Achievable" (BAT) requirements for these types of discharges.

5. REPORTED DISCHARGE AND PROPOSED LIMITS

Description of Discharge - Outfall 004 - Bilge water treatment

Effluent Characteristics	Reported Discharge		Proposed Limits		Applicable Water Quality Criteria and/or Effluent Guidelines
	Monthly Average	Daily Maximum	Monthly Average	Daily Maximum	
Flow (MGD)	0.011	0.041	Report	Report	401 KAR 5:065, Section 2(8)
Polynuclear Aromatic Hydrocarbons	N/A	N/A	Removing from permit		401 KAR 5:080, Section 1(2)(c)2
Total Recoverable Nickel (mg/l)	0.0209	0.0425	Removing from permit		401 KAR 5:080, Section 1(2)(c)2
Total Recoverable Arsenic (mg/l)	0.032	0.1	Removing from permit		401 KAR 5:080, Section 1(2)(c)2
Oil & Grease (mg/l)	5.18	8	10	15	401 KAR 5:080, Section 1(2)(c)2
Total Suspended Solids (mg/l)	8.01	22	30	45	401 KAR 5:080, Section 1(2)(c)2
Total Recoverable Iron (mg/l)	2.39	9.22	3.5	4.0	401 KAR 10:031, Section 6
Total Recoverable Cadmium (mg/l)	0.0078	0.013	0.000271	0.002133	401 KAR 10:031, Section 6
Chromium, Hexavalent (mg/l)	0.0177	0.0365	0.011	0.016	401 KAR 10:031, Section 6
Total Recoverable Copper (mg/l)	0.0115	0.024	0.0093	0.014	401 KAR 10:031, Section 6
Total Residual Chlorine (mg/l)	0.039	0.1768	0.011	0.019	401 KAR 10:031, Section 6
Total Recoverable Lead (mg/l)	0.0146	0.0323	0.00318	0.08165	401 KAR 10:031, Section 6
Total Recoverable Zinc (mg/l)	0.0285	0.095	0.1198	0.1198	401 KAR 5:065, Section 2(12)
Hardness (as mg/l CaCO ₃)	N/A	N/A	Report	Report	401 KAR 5:065, Section 2(8)
2,4-Dimethylphenol (mg/l)	N/A	N/A	Report	Report	401 KAR 5:065, Section 2(8)
Benzo(a)anthracene(mg/l)	N/A	N/A	Report	Report	401 KAR 5:065, Section 2(8)
Fluoranthene (µg/l)	N/A	N/A	Report	Report	401 KAR 5:065, Section 2(8)
pH (min/max)	7.89	8.87	6.0 (min)	9.0 (max)	401 KAR 10:031, Section 4(1)(b)

N/A Not Available

6. **METHODOLOGY USED IN DETERMINING LIMITATIONS**

a. Serial Number

004 - Bilge Water

b. Effluent Characteristics

Total Residual Chlorine	Copper, Total Recoverable	pH
Total Suspended Solids	Cadmium, Total Recoverable	Flow
Lead, Total Recoverable	Iron, Total Recoverable	Hardness
Zinc, Total Recoverable	2,4-Dimethylphenol	Oil & Grease
Chromium (Hexavalent)	Benzo(a)anthracene	Fluoranthene

d. Pertinent Factors

None

d. Monitoring Requirements

Instantaneous flow measurements shall be collected once per Month.

Total Residual Chlorine, Copper (TR), Cadmium (TR), Iron (TR), Lead (TR), Zinc (TR), Chromium (Hexavalent), Oil & Grease, Total Suspended Solids, Benzo(a)anthracene, Fluoranthene and pH shall be monitored once per Month by grab sample. 2,4-Dimethylphenol and Hardness shall be monitored once per Quarter by grab sample.

e. Justification of Limits

The Kentucky Administrative Regulations (KARs) cited below has been duly promulgated pursuant to the requirements of Chapter 224 of the Kentucky Revised Statutes (KRSs).

Flow, Benzo(a)anthracene, 2,4-Dimethylphenol, Fluoranthene and Hardness
 The monitoring requirements for these parameters are consistent with the requirements of 401 KAR 5:065, Section 2(8).

Total Residual Chlorine, Iron (TR), Cadmium (TR), Copper (TR), Lead (TR), Zinc (TR), Chromium (Hexavalent) and pH
 The limits for these parameters are consistent with the requirements of 401 KAR 5:031, Section 4 and 401 KAR 5:045, Section 4.

Oil & Grease and Total Suspended Solids
 The limits and requirements for these parameters are consistent with the requirements of 401 KAR 5:080, Section 1(2)(c)2. These limits are representative of the Division of Water's "Best Professional Judgment" (BPJ) determination of the "Best Practicable Control Technology Currently Available" (BPT) and "Best Available Technology Economically Achievable" (BAT) requirements for these types of discharges.

7. **ANTIDEGRADATION**

The conditions of 401 KAR 5:029, Section 1 has been satisfied by this permit action. Since this permit action involves reissuance of an existing permit, and does not propose an expanded discharge, a review under 401 KAR 5:030 Section 1 is not applicable.

8. **PROPOSED COMPLIANCE SCHEDULE FOR ATTAINING EFFLUENT LIMITATIONS**

Permittee shall comply with the effluent limitations by the effective date of the permit.

9. **PROPOSED SPECIAL CONDITIONS WHICH WILL HAVE A SIGNIFICANT IMPACT ON THE DISCHARGE**

Best Management Practices (BMP) Plan

Pursuant to 401 KAR 5:065, Section 2(10), a BMP requirement shall be included: to control or abate the discharge of pollutants from ancillary areas containing toxic or hazardous substances or those substances which could result in an environmental emergency; where numeric effluent limitations are infeasible; or to carry out the purposes and intent of KRS 224. The facility has several areas where support activities occur which have a potential of the discharge of such substances through storm water runoff or spillage. Some of these areas will drain to present wastewater treatment plants, others will not.

Outfall Signage

As a member of ORSANCO (Ohio River Valley Sanitation Commission) the Commonwealth of Kentucky through the Division of Water implements a requirement that the permittee post a permanent marker at each discharge point to the Ohio River. It is the Best Professional Judgment of the Division of Water, 401 KAR 5:080, Section 1(2)(c)2, that all permittees post a marker at all discharge locations and/or monitoring points. The ORSANCO requirements for the marker specify it to be at least 2 feet by 2 feet in size and a minimum of 3 feet above ground level with the Permittee Name and KPDES permit and outfall numbers in 2 inch letters. For internal monitoring points the marker shall be of sufficient size to include the outfall number in 2 inch letters and is to be posted as near as possible to the actual sampling location.

10. **PERMIT DURATION**

Five (5) years. This facility is in the Tennessee/Mississippi/Cumberland Basin Management Unit as per the Kentucky Watershed Management Framework.

11. **PERMIT INFORMATION**

The application, draft permit fact sheet, public notice, comments received and additional information is available by writing the Division of Water at 200 Fair Oaks Lane, Frankfort, Kentucky 40601.

12. **REFERENCES AND CITED DOCUMENTS**

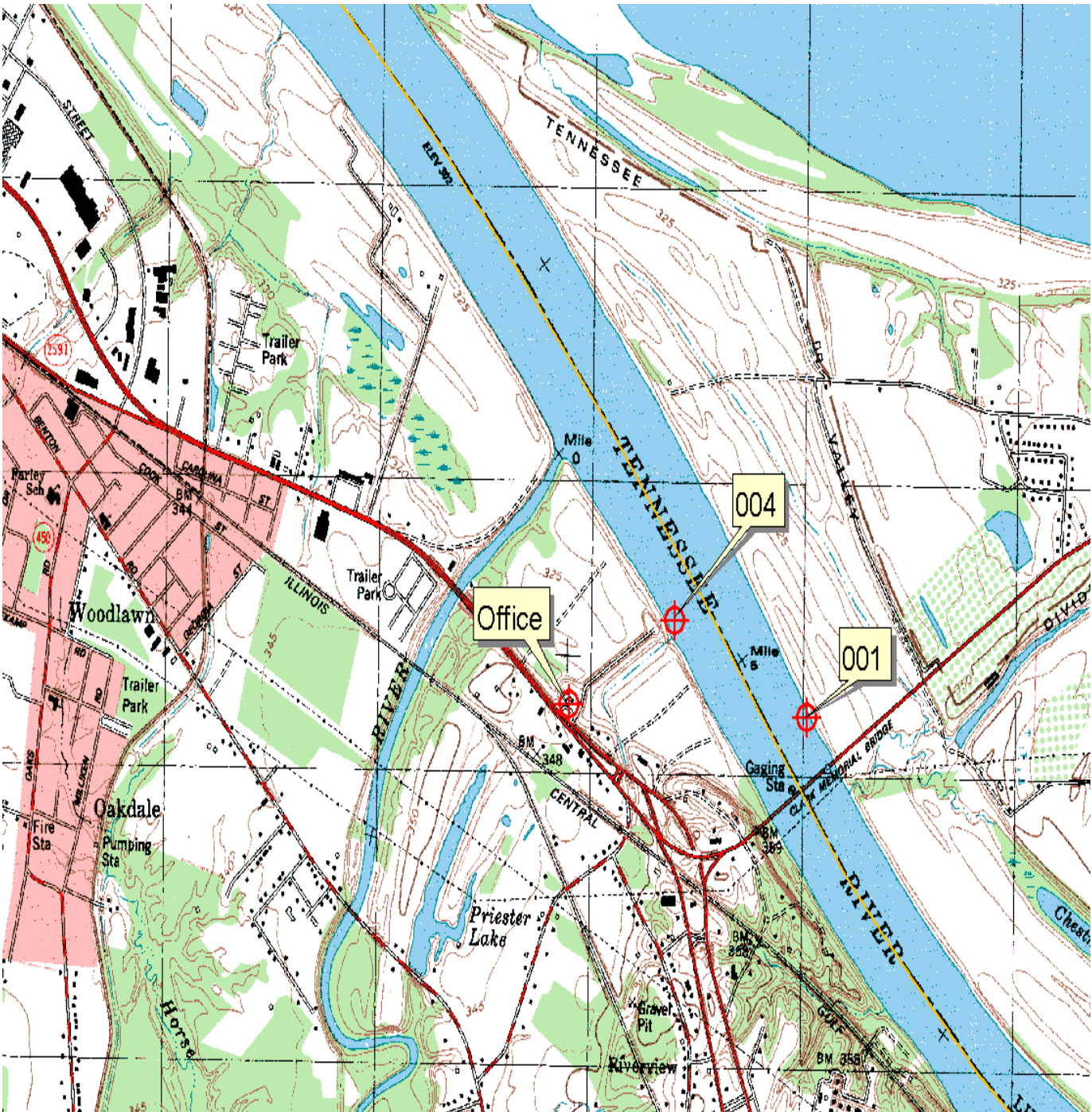
All material and documents referenced or cited in this fact sheet are parts of the permit information as described above and are readily available at the Division of Water Central Office. Information regarding these materials may be obtained from the person listed below.

13. **CONTACT**

For further information contact the individual identified on the Public Notice or the Permit Writer - Mahmoud Sartipi at (502) 564-3410, extension 4954 or e-mail Mahmoud.Sartipi@ky.gov.

14. **PUBLIC NOTICE INFORMATION**

Please refer to the attached Public Notice for details regarding the procedures for a final permit decision, deadline for comments, and other information required by 401 KAR 5:075, Section 4(2)(e).



STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 001

Permit Writer	Mahmoud Sartipi	
Date Entered	11/20/2008	
Facility Name	James Marine	
	Paducah River	
	Service	
KPDES Number	KY0099325	
Outfall Number	001	
Case	Reissuance	
Status:		
Is this an existing facility – Enter “E”	E	
Is this an existing facility with an increase in pollutant load – Enter “I”		
Is this a new facility – Enter “N”		
Is this a regional facility with an approved up-to-date 201 plan – Enter “R”		
Has the permittee made a successful alternatives analysis/socioeconomic demonstration – Enter “A”		
Receiving Water Name	Tennessee River	
Discharge Mile Point	5.2	
Public Water Supply Name	Paducah Water	
	Works	
Intake Water Name	Paducah Water	
	Works	
Intake Mile Point	45.8	
Total Effluent Flow (Q_T)	0.04395	MGD
Receiving Water 7Q10 (Q_{RW7Q10})	5000	cfs
Receiving Water Harmonic Mean (Q_{RWHM})	43800	cfs
Receiving Water pH	7.6	SU
Receiving Water Temperature	20.00	°C
Intake Water 7Q10 (Q_{IW7Q10})	51000	cfs
Intake Water Harmonic Mean (Q_{IWHM})	175000	cfs
Effluent Hardness	100	(as mg/l CaCO ₃)
Receiving Water Hardness	100	(as mg/l CaCO ₃)
Zone of Initial Dilution (ZID)	1	
Mixing Zone (MZ)	0	
Acute to Chronic Ratio (ACR)	0.1	
Impaired	No	
Permittee agrees to accept no mixing zone for bioaccumulative or persistent pollutants prior to 09/08/2014	yes	

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 001

Calculation Methodology

Definitions

Acute to Chronic Ratio	ACR	Total Effluent Flow	Q_T
Aquatic Life Acute Criteria	C_A	Receiving Water 7Q10	Q_{RW7Q10}
Aquatic Life Chronic Criteria	C_C	Receiving Water Harmonic Mean	Q_{RWHM}
Human Health Criteria - Fish Only	C_{HHFO}	Intake Water 7Q10	Q_{IW7Q10}
Human Health Criteria - Fish & Water	C_{HHFW}	Intake Water Harmonic Mean	Q_{IWHM}
End of Pipe Effluent Limit	C_T	Zone of Initial Dilution	ZID
Instream Background Concentration	C_U	Mixing Zone	MZ
Toxicity Units - Acute	TU_a	Toxicity Units - Chronic	TU_c
Effluent Hardness	H_T	Receiving Water Hardness	H_{RW}

Aquatic Life - Chemical Specific

Acute

NO ZID given $C_T = C_A$
 ZID given $C_T = (C_A - C_U) \times (ZID)$

Chronic Mixing Zone / Complete Mix

$$C_T = \{C_C[Q_T + (MZ)(Q_{RW7Q10})] - [C_U(MZ)(Q_{RW7Q10})]\} / Q_T$$

Human Health - Chemical Specific

Fish Only: Mixing Zone / Complete Mix

Carcinogen / Non-Carcinogen $C_T = \{C_{HHFO}[Q_T + (MZ)(Q_{RWHM})] - C_U(MZ)(Q_{RWHM})\} / Q_T$

Fish & Water Only: Mixing Zone / Applicable at point of withdrawal

Carcinogen $C_T = \{C_{HHFW}[Q_T + (Q_{IWHM})] - C_U(Q_{IWHM})\} / Q_T$
 Non-Carcinogen $C_T = \{C_{HHFW}[Q_T + (Q_{IW7Q10})] - C_U(Q_{IW7Q10})\} / Q_T$

Aquatic Life - Whole Effluent Toxicity

Acute (Units TU_a)

NO ZID given $C_T = C_A$
 ZID given $C_T = (C_A - C_U) \times (ZID)$

Chronic Mixing Zone / Complete Mix (Units TU_c)

$C_T = \{C_C[Q_T + (MZ)(Q_{RW7Q10})] - [C_U(MZ)(Q_{RW7Q10})]\} / Q_T$
 Conversion of TU_c to TU_a : $TU_c \times ACR = TU_a$

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 001

Metal Aquatic Criteria

Pollutant

Total Recoverable Cadmium
 Chromium III
 Total Recoverable Copper
 Total Recoverable Lead
 Total Recoverable Nickel
 Total Recoverable Silver
 Total Recoverable Zinc

Acute Criteria

$e^{(1.0166 (\ln \text{Hardness}) - 3.924)}$
 $e^{(0.8190 (\ln \text{Hardness}) + 3.7256)}$
 $e^{(0.9422 (\ln \text{Hardness}) - 1.700)}$
 $e^{(1.273 (\ln \text{Hardness}) - 1.460)}$
 $e^{(0.8460 (\ln \text{Hardness}) + 2.255)}$
 $e^{(1.72 (\ln \text{Hardness}) - 6.59)}$
 $e^{(0.8473 (\ln \text{Hardness}) + 0.884)}$

Chronic Criteria

$e^{(0.7409 (\ln \text{Hardness}) - 4.719)}$
 $e^{(0.8190 (\ln \text{Hardness}) + 0.6848)}$
 $e^{(0.8545 (\ln \text{Hardness}) - 1.702)}$
 $e^{(1.273 (\ln \text{Hardness}) - 4.705)}$
 $e^{(0.8460 (\ln \text{Hardness}) + 0.0584)}$
 $e^{(0.8473 (\ln \text{Hardness}) + 0.884)}$

Hardness (as mg/l CaCO₃)

Zone Initial Dilution (ZID)
 Mixing Zone

$$H_{RW} + [H_T + H_{RW}]/ZID$$

$$[(Q_{RW7Q10})(MZ)(H_{RW}) + (Q_T)(H_T)]/[(Q_{RW7Q10})(MZ) + (Q_T)]$$

Total Ammonia Criteria

Chronic - applies state wide - unionized criteria of 0.05 mg/l

Acute - applies to the Ohio River (ORSANCO Criteria)

$$[0.05 * (1 + 10^{(pKa - pH)})] / 1.2$$

$$[0.411 / (1 + 10^{(7.204 - pH)})] + [58.4 / (1 + 10^{(pH - 7.204)})]$$

$$pKa = (0.0902 + (2730 / (273.1 + T)))$$

T = Temperature °C

Bioaccumulative or Persistent

For new facilities after September 8, 2004 mixing zones shall not be granted for bioaccumulative or persistent pollutants of concern.

Mixing zones for bioaccumulative or persistent pollutants of concerned assigned prior to September 8, 2004 shall expire no later than September 8, 2014, unless the permittee agrees to expiration of the mixing zone prior to that date.

Therefore, the application of the more stringent criteria of Human Health Fish & Water Consumption, Human Health Fish Only Consumption, and Aquatic Life Chronic shall apply as end-of-pipe effluent limitations.

Antidegradation

If a new facility or an existing facility that will have a pollutant load increase, the effluent limits are halved unless the receiving stream is impaired or the permittee has demonstrated a negative socioeconomic or cost benefit analysis.

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 001

Reasonable Potential Analysis

In establishing water quality based effluent conditions the Division of Water must determine if the pollutant concentrations in the discharge will cause, have the reasonable potential to cause, or contribute to an excursion of any water standard. The process by which the Division of Water makes this determination is known as a Reasonable Potential Analysis.

A Reasonable Potential Analysis is performed by first calculating the expected effluent limitations for those pollutants with water quality criteria. The calculated limits are then compared to the concentrations reported on the KPDES permit application and/or a summarization of the values reported on the Discharge Monitoring Report (DMRs) submitted during the term of the permit. This comparison is made by dividing the reported value by the calculated effluent limitation and converting to a percentage. The following criteria are used in determining how the pollutant will be addressed in the permit.

New Permits or New Pollutants on Permit Renewals

If the reported concentration is less than 70% of the calculated effluent limit then no monitoring or limitations will be required.

If the reported concentration is equal to or greater than 70% but less than 90% of the calculated effluent limit then monitoring will be required.

If the reported concentration is equal to or greater than 90% and the number of analysis reported on the KPDES permit application is less than 12 then monitoring will be required.

If the reported concentration is equal to or greater than 90% and the number of analysis reported on the KPDES permit application is equal or greater than 12 then an effluent limitation will be required.

Permit Renewals - Existing Pollutants

If the reported concentration is less than 70% of the calculated effluent limit then and the source of the reported concentration was the DMRs for that facility and there were more than 12 DMRs utilized to determine the reported concentrations then the pollutant will be removed from the permit.

If the reported concentration is equal to or greater than 70% but less than 90% of the calculated effluent limit then monitoring will be required.

If the reported concentration is equal to or greater than 90% then an effluent limitation will be required.

In all cases, the Division of Water still may exercise its Best Professional Judgment in the implementation of the results.

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 001

Parameter	CAS Number	Reported Discharge (mg/l)		Calculated Effluent Limitations (mg/l)		Reasonable Potential		Data Source	No. of Samples	Effluent Requirement		Justification	
		Average	Maximum	Average	Maximum	Average	Maximum			Average	Maximum	Average	Maximum
Chloride	16887006	31.250000	122.000000	600.000000	1,200.000000	5.21%	10.17%	DMR	62	Remove	Remove	Chronic	Acute
Total Residual Chlorine		0.000000	0.000000	0.011000	0.019000	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Color		0.000000	0.000000	56,221.918003	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Fluoride		0.000000	0.000000	1,499,251.146758	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Nitrate-Nitrite (as N)	14797558	0.000000	0.000000	7,496,255.733788	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Alpha		0.000000	0.000000	NA	15.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Beta		0.000000	0.000000	NA	50.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Radium		0.000000	0.000000	NA	5.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Sulfate (as SO4)		0.000000	0.000000	187,406,393.344710	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Surfactants		0.000000	0.000000	374,812.786689	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Recoverable Barium	7440393	0.000000	0.000000	749,625.573379	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Recoverable Iron	7439896	0.700000	3.260000	1.000000	4.000000	70.00%	81.50%	DMR	62	Monitoring	Monitoring	Chronic	Acute
Total Recoverable Antimony	7440360	0.000000	0.000000	0.640000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Total Recoverable Arsenic	7440382	0.000000	0.000000	0.150000	0.340000	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Total Recoverable Beryllium	7440417	0.000000	0.000000	2,998.502294	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Recoverable Cadmium	7440439	0.000000	0.000000	0.000271	0.002133	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Total Recoverable Chromium	7440439	0.000000	0.000000	74,962.557338	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Recoverable Copper	7440508	0.000000	0.000000	0.009329	0.013999	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Total Recoverable Lead	7439921	0.000000	0.000000	0.003182	0.081645	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Total Recoverable Mercury	7439976	0.000000	0.000000	0.000051	0.001700	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Total Recoverable Nickel	7440020	0.000000	0.000000	0.052163	0.469174	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Total Recoverable Selenium	7782492	0.000000	0.000000	0.005000	0.020000	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Total Recoverable Silver	7440224	0.000000	0.000000	NA	0.003784	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Recoverable Thallium	7440280	0.000000	0.000000	0.006300	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Total Recoverable Zinc	7440666	0.000000	0.000000	0.119816	0.119816	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Free Cyanide	57125	0.000000	0.000000	0.005200	0.022000	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
2,3,7,8 Tetrachlorodibenzo P Dioxin	1746016	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Acrolein	107028	0.000000	0.000000	0.290000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Acrylonitrile	107131	0.000000	0.000000	0.000250	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzene	71432	0.000000	0.000000	0.051000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bromoform	75252	0.000000	0.000000	0.140000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Carbon Tetrachloride	56235	0.000000	0.000000	0.001600	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chlorobenzene	108907	0.000000	0.000000	21.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chlorodibromomethane	124481	0.000000	0.000000	0.013000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chloroform	67663	0.000000	0.000000	0.470000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Dichlorobromomethane	75274	0.000000	0.000000	0.017000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Dichloroethane	107062	0.000000	0.000000	0.037000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,1-Dichloroethylene	75354	0.000000	0.000000	0.003200	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Dichloropropane	78875	0.000000	0.000000	0.015000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,3-Dichloropropene	542756	0.000000	0.000000	1.700000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Ethylbenzene	100414	0.000000	0.000000	29.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Methyl Bromide	74839	0.000000	0.000000	1.500000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Methylene Chloride	75092	0.000000	0.000000	0.590000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,1,2,2-Tetrachloroethane	79345	0.000000	0.000000	0.004000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Tetrachloroethylene	127184	0.000000	0.000000	0.003300	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 001

Parameter	CAS Number	Reported Discharge (mg/l)		Calculated Effluent Limitations (mg/l)		Reasonable Potential		Data Source	No. of Samples	Effluent Requirement		Justification	
		Average	Maximum	Average	Maximum	Average	Maximum			Average	Maximum	Average	Maximum
Toluene	108883	0.000000	0.000000	200.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Trans-Dichloroethylene	156605	0.000000	0.000000	140.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,1,1-Trichloroethane	71556	0.000000	0.000000	149,925.114676	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
1,1,2-Trichloroethane	79005	0.000000	0.000000	0.016000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Trichloroethylene	79016	0.000000	0.000000	0.030000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Vinyl Chloride	75014	0.000000	0.000000	0.530000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2-Chlorophenol	95578	0.000000	0.000000	0.150000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-Dichlorophenol	120832	0.000000	0.000000	0.290000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-Dimethylphenol	105679	0.000000	0.000000	0.850000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-Dinitrophenol	51285	0.000000	0.000000	5.300000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Pentachlorophenol	87865	0.000000	0.000000	0.003000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Phenol	108952	0.000000	0.000000	1,700.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4,6-Trichlorophenol	88062	0.000000	0.000000	0.002400	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Acenaphthene	83329	0.000000	0.000000	0.990000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Anthracene	120127	0.000000	0.000000	40.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzidine	92875	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzo(a)anthracene	56553	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzo(a)pyrene	50328	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzo(k)fluoranthene	205992	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bis(2-chloroisopropyl)ether	108601	0.000000	0.000000	65.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bis(2-ethylhexyl)phthalate	117817	0.000000	0.000000	0.002200	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Butylbenzyl phthalate	85687	0.000000	0.000000	1.900000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2-Chloronaphthalene	91587	0.000000	0.000000	1.600000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chrysene	218019	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Dibenzo(a,h)anthracene	53703	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Dichlorobenzene	95501	0.000000	0.000000	17.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,3-Dichlorobenzene	541731	0.000000	0.000000	0.960000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,4-Dichlorobenzene	106467	0.000000	0.000000	2.600000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
3,3-Dichlorobenzidine	91941	0.000000	0.000000	0.000028	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Diethyl phthalate	84662	0.000000	0.000000	44.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Dimethyl phthalate	131113	0.000000	0.000000	1,100.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Di-n-butyl phthalate	84742	0.000000	0.000000	4.500000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-Dinitrotoluene	121142	0.000000	0.000000	0.003400	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Diphenylhydrazine	122667	0.000000	0.000000	0.000200	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Fluoranthene	206440	0.000000	0.000000	0.140000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Fluorene	86737	0.000000	0.000000	5.300000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hexachlorobenzene	118741	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hexachlorobutadiene	87683	0.000000	0.000000	0.018000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hexachlorocyclopentadiene	77474	0.000000	0.000000	17.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hexachloroethane	67721	0.000000	0.000000	0.003300	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Ideno(1,2,3-cd)pyrene	193395	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Isophorone	78591	0.000000	0.000000	0.960000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Nitrobenzene	98953	0.000000	0.000000	0.690000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosodimethylamine	62759	0.000000	0.000000	0.003000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosodi-n-Propylamine	621647	0.000000	0.000000	0.000510	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 001

Parameter	CAS Number	Reported Discharge (mg/l)		Calculated Effluent Limitations (mg/l)		Reasonable Potential		Data Source	No. of Samples	Effluent Requirement		Justification	
		Average	Maximum	Average	Maximum	Average	Maximum			Average	Maximum	Average	Maximum
N-Nitrosodiphenylamine	86306	0.000000	0.000000	0.006000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Pyrene	129000	0.000000	0.000000	4.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2,4-Trichlorobenzene	120821	0.000000	0.000000	0.940000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Aldrin	309002	0.000000	0.000000	0.000000	0.003000	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
alpha-BHC	319846	0.000000	0.000000	0.000005	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Beta-BHC	319857	0.000000	0.000000	0.000017	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
gamma-BHC (Lindane)	58899	0.000000	0.000000	0.000063	0.000950	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Chlordane	57749	0.000000	0.000000	0.000001	0.002400	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
4,4'-DDT	50293	0.000000	0.000000	0.000000	0.001100	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
4,4'-DDE	72559	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
4,4'-DDD	72548	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Dieldrin	60571	0.000000	0.000000	0.000000	0.000240	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Alpha-Endosulfan	959988	0.000000	0.000000	0.000056	0.000220	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Beta-Endosulfan	33213659	0.000000	0.000000	0.000056	0.000220	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Endosulfan sulfate	1031078	0.000000	0.000000	0.089000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Endrin	72208	0.000000	0.000000	0.000036	0.000086	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Endrin aldehyde	7421934	0.000000	0.000000	0.000300	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Heptachlor	76448	0.000000	0.000000	0.000000	0.000520	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Heptachlor epoxide	1024573	0.000000	0.000000	0.000000	0.000520	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Polychlorinated Biphenyls (PCBs)		0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Toxaphene	8001352	0.000000	0.000000	0.000000	0.000730	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
1,2,4,5-Tetrachlorobenzene	95943	0.000000	0.000000	0.001100	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2-methyl-4,6-dinitrophenol	534521	0.000000	0.000000	0.280000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-D	94757	0.000000	0.000000	180,056.952821	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
2,4,5-TP (Silvex)	93721	0.000000	0.000000	7,496.255734	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
2,4,5-trichlorophenol	95954	0.000000	0.000000	3.600000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Asbestos	1332214	0.000000	0.000000	18,005,695,282.138800	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Benzo(b)fluoranthene	205992	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bis(2-chloroethyl)ether	111444	0.000000	0.000000	0.000530	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bis(chloromethyl)ether	542881	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chloropyrifos	2921882	0.000000	0.000000	0.000041	0.000083	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Chromium (III)	16065831	0.000000	0.000000	0.086180	1.803049	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Chromium (VI)	18540299	0.000000	0.000000	0.011000	0.016000	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Demeton	8065483	0.000000	0.000000	0.000100	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Dinitrophenols	25550587	0.000000	0.000000	5.300000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Guthion	86500	0.000000	0.000000	0.000010	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Hexachlorocyclo-hexane-Technical	319868	0.000000	0.000000	0.000041	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hydrogen Sulfide, Undissociated	7783064	0.560000	11.400000	0.002000	NA	28000.00%	0.00%	DMR	60	Limit	Remove	Chronic	NA
Malathion	121755	0.000000	0.000000	0.000100	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Methoxychlor	72435	0.000000	0.000000	0.000030	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Mirex	2385855	0.000000	0.000000	0.000001	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Nitrosamines, Other		0.000000	0.000000	0.001240	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosodibutylamine	924163	0.000000	0.000000	0.000220	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosodiethylamine	55185	0.000000	0.000000	0.001240	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosopyrrolidine	930552	0.000000	0.000000	0.034000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 001

Parameter	CAS Number	Reported Discharge (mg/l)		Calculated Effluent Limitations (mg/l)		Reasonable Potential		Data Source	No. of Samples	Effluent Requirement		Justification	
		Average	Maximum	Average	Maximum	Average	Maximum			Average	Maximum	Average	Maximum
Parathion	56382	0.000000	0.000000	0.000013	0.000065	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Pentachlorobenzene	608935	0.000000	0.000000	0.001500	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Phthalate esters		0.000000	0.000000	0.003000	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Total Dissolved Solids		0.000000	0.000000	562,219,180.034130	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Tritium		0.000000	0.000000	NA	20,000.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Strontium-90		0.000000	0.000000	NA	8.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Uranium		0.000000	0.000000	NA	0.030000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Ammonia		0.980000	2.850000	2.678236	17.032201	36.59%	16.73%	DMR	62	Remove	Remove	Chronic	Acute

Hardness

Metal limitations are developed using the mixed hardness of the effluent and receiving waters

Toxicity

<u>Type of Test</u>	<u>Maximum</u>	<u>Units</u>	<u>Justification</u>	<u>Percent Effluent</u>
Chronic	1.00	TUc	Chronic	100.00%

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 004

Permit Writer	Mahmoud Sartipi	
Date Entered	11/20/2008	
Facility Name	James Marine Paducah River Service	
KPDES Number	KY0099325	
Outfall Number	004	
Case	Reissuance	
Status:		
Is this an existing facility – Enter “E”	E	
Is this an existing facility with an increase in pollutant load – Enter “I”		
Is this a new facility – Enter “N”		
Is this a regional facility with an approved up-to-date 201 plan – Enter “R”		
Has the permittee made a successful alternatives analysis/socioeconomic demonstration – Enter “A”		
Receiving Water Name	Tennessee River	
Discharge Mile Point	4.9	
Public Water Supply Name	Paducah Water Works	
Intake Water Name	Paducah Water Works	
Intake Mile Point	45.8	
Total Effluent Flow (Q_T)	0.01095	MGD
Receiving Water 7Q10 (Q_{RW7Q10})	5000	cfs
Receiving Water Harmonic Mean (Q_{RWHM})	43800	cfs
Receiving Water pH	7.6	SU
Receiving Water Temperature	20.00	°C
Intake Water 7Q10 (Q_{IW7Q10})	51000	cfs
Intake Water Harmonic Mean (Q_{IWHM})	175000	cfs
Effluent Hardness	100	(as mg/l CaCO ₃)
Receiving Water Hardness	100	(as mg/l CaCO ₃)
Zone of Initial Dilution (ZID)	1	
Mixing Zone (MZ)	0	
Acute to Chronic Ratio (ACR)	0.1	
Impaired	No	
Permittee agrees to accept no mixing zone for bioaccumulative or persistent pollutants prior to 09/08/2014	yes	

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 004

Calculation Methodology

Definitions

Acute to Chronic Ratio	ACR	Total Effluent Flow	Q_T
Aquatic Life Acute Criteria	C_A	Receiving Water 7Q10	Q_{RW7Q10}
Aquatic Life Chronic Criteria	C_C	Receiving Water Harmonic Mean	Q_{RWHM}
Human Health Criteria - Fish Only	C_{HHFO}	Intake Water 7Q10	Q_{IW7Q10}
Human Health Criteria - Fish & Water	C_{HHFW}	Intake Water Harmonic Mean	Q_{IWHM}
End of Pipe Effluent Limit	C_T	Zone of Initial Dilution	ZID
Instream Background Concentration	C_U	Mixing Zone	MZ
Toxicity Units - Acute	TU_a	Toxicity Units - Chronic	TU_c
Effluent Hardness	H_T	Receiving Water Hardness	H_{RW}

Aquatic Life - Chemical Specific

Acute

NO ZID given $C_T = C_A$
 ZID given $C_T = (C_A - C_U) \times (ZID)$

Chronic Mixing Zone / Complete Mix

$$C_T = \{C_C[Q_T + (MZ)(Q_{RW7Q10})] - [C_U(MZ)(Q_{RW7Q10})]\} / Q_T$$

Human Health - Chemical Specific

Fish Only: Mixing Zone / Complete Mix

Carcinogen / Non-Carcinogen $C_T = \{C_{HHFO}[Q_T + (MZ)(Q_{RWHM})] - C_U(MZ)(Q_{RWHM})\} / Q_T$

Fish & Water Only: Mixing Zone / Applicable at point of withdrawal

Carcinogen $C_T = \{C_{HHFW}[Q_T + (Q_{IWHM})] - C_U(Q_{IWHM})\} / Q_T$
 Non-Carcinogen $C_T = \{C_{HHFW}[Q_T + (Q_{IW7Q10})] - C_U(Q_{IW7Q10})\} / Q_T$

Aquatic Life - Whole Effluent Toxicity

Acute (Units TU_a)

NO ZID given $C_T = C_A$
 ZID given $C_T = (C_A - C_U) \times (ZID)$

Chronic Mixing Zone / Complete Mix (Units TU_c)

$C_T = \{C_C[Q_T + (MZ)(Q_{RW7Q10})] - [C_U(MZ)(Q_{RW7Q10})]\} / Q_T$
 Conversion of TU_c to TU_a : $TU_c \times ACR = TU_a$

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 004

Metal Aquatic Criteria

Pollutant

Total Recoverable Cadmium
 Chromium III
 Total Recoverable Copper
 Total Recoverable Lead
 Total Recoverable Nickel
 Total Recoverable Silver
 Total Recoverable Zinc

Acute Criteria

$e^{(1.0166 (\ln \text{Hardness}) - 3.924)}$
 $e^{(0.8190 (\ln \text{Hardness}) + 3.7256)}$
 $e^{(0.9422 (\ln \text{Hardness}) - 1.700)}$
 $e^{(1.273 (\ln \text{Hardness}) - 1.460)}$
 $e^{(0.8460 (\ln \text{Hardness}) + 2.255)}$
 $e^{(1.72 (\ln \text{Hardness}) - 6.59)}$
 $e^{(0.8473 (\ln \text{Hardness}) + 0.884)}$

Chronic Criteria

$e^{(0.7409 (\ln \text{Hardness}) - 4.719)}$
 $e^{(0.8190 (\ln \text{Hardness}) + 0.6848)}$
 $e^{(0.8545 (\ln \text{Hardness}) - 1.702)}$
 $e^{(1.273 (\ln \text{Hardness}) - 4.705)}$
 $e^{(0.8460 (\ln \text{Hardness}) + 0.0584)}$
 $e^{(0.8473 (\ln \text{Hardness}) + 0.884)}$

Hardness (as mg/l CaCO₃)

Zone Initial Dilution (ZID)
 Mixing Zone

$$H_{RW} + [H_T + H_{RW}]/ZID$$

$$[(Q_{RW7Q10})(MZ)(H_{RW}) + (Q_T)(H_T)]/[(Q_{RW7Q10})(MZ) + (Q_T)]$$

Total Ammonia Criteria

Chronic - applies state wide - unionized criteria of 0.05 mg/l

Acute - applies to the Ohio River (ORSANCO Criteria)

$$\frac{[0.05 * (1 + 10^{(pKa - pH)})]^{1.2}}{[0.411 / (1 + 10^{(7.204 - pH)})] + [58.4 / (1 + 10^{(pH - 7.204)})]}$$

$$pKa = (0.0902 + (2730 / (273.1 + T)))$$

T = Temperature °C

Bioaccumulative or Persistent

For new facilities after September 8, 2004 mixing zones shall not be granted for bioaccumulative or persistent pollutants of concern.

Mixing zones for bioaccumulative or persistent pollutants of concerned assigned prior to September 8, 2004 shall expire no later than September 8, 2014, unless the permittee agrees to expiration of the mixing zone prior to that date.

Therefore, the application of the more stringent criteria of Human Health Fish & Water Consumption, Human Health Fish Only Consumption, and Aquatic Life Chronic shall apply as end-of-pipe effluent limitations.

Antidegradation

If a new facility or an existing facility that will have a pollutant load increase, the effluent limits are halved unless the receiving stream is impaired or the permittee has demonstrated a negative socioeconomic or cost benefit analysis.

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 004

Reasonable Potential Analysis

In establishing water quality based effluent conditions the Division of Water must determine if the pollutant concentrations in the discharge will cause, have the reasonable potential to cause, or contribute to an excursion of any water standard. The process by which the Division of Water makes this determination is known as a Reasonable Potential Analysis.

A Reasonable Potential Analysis is performed by first calculating the expected effluent limitations for those pollutants with water quality criteria. The calculated limits are then compared to the concentrations reported on the KPDES permit application and/or a summarization of the values reported on the Discharge Monitoring Report (DMRs) submitted during the term of the permit. This comparison is made by dividing the reported value by the calculated effluent limitation and converting to a percentage. The following criteria are used in determining how the pollutant will be addressed in the permit.

New Permits or New Pollutants on Permit Renewals

If the reported concentration is less than 70% of the calculated effluent limit then no monitoring or limitations will be required.

If the reported concentration is equal to or greater than 70% but less than 90% of the calculated effluent limit then monitoring will be required.

If the reported concentration is equal to or greater than 90% and the number of analysis reported on the KPDES permit application is less than 12 then monitoring will be required.

If the reported concentration is equal to or greater than 90% and the number of analysis reported on the KPDES permit application is equal or greater than 12 then an effluent limitation will be required.

Permit Renewals - Existing Pollutants

If the reported concentration is less than 70% of the calculated effluent limit then and the source of the reported concentration was the DMRs for that facility and there were more than 12 DMRs utilized to determine the reported concentrations then the pollutant will be removed from the permit.

If the reported concentration is equal to or greater than 70% but less than 90% of the calculated effluent limit then monitoring will be required.

If the reported concentration is equal to or greater than 90% then an effluent limitation will be required.

In all cases, the Division of Water still may exercise its Best Professional Judgment in the implementation of the results.

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 004

Parameter	CAS Number	Reported Discharge (mg/l)		Calculated Effluent Limitations (mg/l)		Reasonable Potential		Data Source	No. of Samples	Effluent Requirement		Justification	
		Average	Maximum	Average	Maximum	Average	Maximum			Average	Maximum	Average	Maximum
Chloride	16887006	0.000000	0.000000	600.000000	1,200.000000	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Total Residual Chlorine		0.039000	0.600000	0.011000	0.019000	354.55%	3157.89%	DMR	59	Limit	Limit	Chronic	Acute
Color		0.000000	0.000000	225,657.609247	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Fluoride		0.000000	0.000000	6,017,536.246575	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Nitrate-Nitrite (as N)	14797558	0.000000	0.000000	30,087,681.232877	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Alpha		0.000000	0.000000	NA	15.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Beta		0.000000	0.000000	NA	50.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Radium		0.000000	0.000000	NA	5.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Sulfate (as SO4)		0.000000	0.000000	752,192,030.821918	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Surfactants		0.000000	0.000000	1,504,384.061644	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Recoverable Barium	7440393	0.000000	0.000000	3,008,768.123288	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Recoverable Iron	7439896	2.390000	8.510000	1.000000	4.000000	239.00%	212.75%	DMR	60	Limit	Limit	Chronic	Acute
Total Recoverable Antimony	7440360	0.000000	0.000000	0.640000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Total Recoverable Arsenic	7440382	0.032000	0.100000	0.150000	0.340000	21.33%	29.41%	DMR	60	Remove	Remove	Chronic	Acute
Total Recoverable Beryllium	7440417	0.000000	0.000000	12,035.072493	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Recoverable Cadmium	7440439	0.007800	0.013000	0.000271	0.002133	2882.24%	609.42%	DMR	60	Limit	Limit	Chronic	Acute
Total Recoverable Chromium	7440439	0.000000	0.000000	300,876.812329	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Total Recoverable Copper	7440508	0.011500	0.024000	0.009329	0.013999	123.27%	171.44%	DMR	59	Limit	Limit	Chronic	Acute
Total Recoverable Lead	7439921	0.014600	0.032300	0.003182	0.081645	458.89%	39.56%	DMR	60	Limit	Remove	Chronic	Acute
Total Recoverable Mercury	7439976	0.000000	0.000000	0.000051	0.001700	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Total Recoverable Nickel	7440020	0.020900	0.042500	0.052163	0.469174	40.07%	9.06%	DMR	60	Remove	Remove	Chronic	Acute
Total Recoverable Selenium	7782492	0.000000	0.000000	0.005000	0.020000	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Total Recoverable Silver	7440224	0.000000	0.000000	NA	0.003784	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Recoverable Thallium	7440280	0.000000	0.000000	0.006300	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Total Recoverable Zinc	7440666	0.028500	0.095000	0.119816	0.119816	23.79%	79.29%	DMR	60	Remove	Monitoring	Chronic	Acute
Free Cyanide	57125	0.000000	0.000000	0.005200	0.022000	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
2,3,7,8 Tetrachlorodibenzo P Dioxin	1746016	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Acrolein	107028	0.000000	0.000000	0.290000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Acrylonitrile	107131	0.000000	0.000000	0.000250	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzene	71432	0.000000	0.000000	0.051000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bromoform	75252	0.000000	0.000000	0.140000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Carbon Tetrachloride	56235	0.000000	0.000000	0.001600	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chlorobenzene	108907	0.000000	0.000000	21.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chlorodibromomethane	124481	0.000000	0.000000	0.013000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chloroform	67663	0.000000	0.000000	0.470000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Dichlorobromomethane	75274	0.000000	0.000000	0.017000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Dichloroethane	107062	0.000000	0.000000	0.037000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,1-Dichloroethylene	75354	0.000000	0.000000	0.003200	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Dichloropropane	78875	0.000000	0.000000	0.015000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,3-Dichloropropene	542756	0.000000	0.000000	1.700000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Ethylbenzene	100414	0.000000	0.000000	29.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Methyl Bromide	74839	0.000000	0.000000	1.500000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Methylene Chloride	75092	0.000000	0.000000	0.590000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,1,2,2-Tetrachloroethane	79345	0.000000	0.000000	0.004000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Tetrachloroethylene	127184	0.000000	0.000000	0.003300	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA

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Parameter	CAS Number	Reported Discharge (mg/l)		Calculated Effluent Limitations (mg/l)		Reasonable Potential		Data Source	No. of Samples	Effluent Requirement		Justification	
		Average	Maximum	Average	Maximum	Average	Maximum			Average	Maximum	Average	Maximum
Toluene	108883	0.000000	0.000000	200.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Trans-Dichloroethylene	156605	0.000000	0.000000	140.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,1,1-Trichloroethane	71556	0.000000	0.000000	601,753.624658	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
1,1,2-Trichloroethane	79005	0.000000	0.000000	0.016000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Trichloroethylene	79016	0.000000	0.000000	0.030000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Vinyl Chloride	75014	0.000000	0.000000	0.530000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2-Chlorophenol	95578	0.000000	0.000000	0.150000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-Dichlorophenol	120832	0.000000	0.000000	0.290000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-Dimethylphenol	105679	0.000000	0.000000	0.850000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-Dinitrophenol	51285	0.000000	0.000000	5.300000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Pentachlorophenol	87865	0.000000	0.000000	0.003000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Phenol	108952	0.000000	0.000000	1,700.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4,6-Trichlorophenol	88062	0.000000	0.000000	0.002400	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Acenaphthene	83329	0.000000	0.000000	0.990000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Anthracene	120127	0.000000	0.000000	40.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benidine	92875	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzo(a)anthracene	56553	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzo(a)pyrene	50328	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Benzo(k)fluoranthene	205992	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bis(2-chloroisopropyl)ether	108601	0.000000	0.000000	65.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bis(2-ethylhexyl)phthalate	117817	0.000000	0.000000	0.002200	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Butylbenzyl phthalate	85687	0.000000	0.000000	1.900000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2-Chloronaphthalene	91587	0.000000	0.000000	1.600000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chrysene	218019	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Dibenzo(a,h)anthracene	53703	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Dichlorobenzene	95501	0.000000	0.000000	17.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,3-Dichlorobenzene	541731	0.000000	0.000000	0.960000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,4-Dichlorobenzene	106467	0.000000	0.000000	2.600000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
3,3-Dichlorobenzidine	91941	0.000000	0.000000	0.000028	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Diethyl phthalate	84662	0.000000	0.000000	44.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Dimethyl phthalate	131113	0.000000	0.000000	1,100.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Di-n-butyl phthalate	84742	0.000000	0.000000	4.500000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-Dinitrotoluene	121142	0.000000	0.000000	0.003400	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2-Diphenylhydrazine	122667	0.000000	0.000000	0.000200	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Fluoranthene	206440	0.000000	0.000000	0.140000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Fluorene	86737	0.000000	0.000000	5.300000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hexachlorobenzene	118741	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hexachlorobutadiene	87683	0.000000	0.000000	0.018000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hexachlorocyclopentadiene	77474	0.000000	0.000000	17.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hexachloroethane	67721	0.000000	0.000000	0.003300	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Ideno(1,2,3-cd)pyrene	193395	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Isophorone	78591	0.000000	0.000000	0.960000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Nitrobenzene	98953	0.000000	0.000000	0.690000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosodimethylamine	62759	0.000000	0.000000	0.003000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosodi-n-Propylamine	621647	0.000000	0.000000	0.000510	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA

STEADY STATE TOXICS WASTELoad ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 004

Parameter	CAS Number	Reported Discharge (mg/l)		Calculated Effluent Limitations (mg/l)		Reasonable Potential		Data Source	No. of Samples	Effluent Requirement		Justification	
		Average	Maximum	Average	Maximum	Average	Maximum			Average	Maximum	Average	Maximum
N-Nitrosodiphenylamine	86306	0.000000	0.000000	0.006000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Pyrene	129000	0.000000	0.000000	4.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
1,2,4-Trichlorobenzene	120821	0.000000	0.000000	0.940000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Aldrin	309002	0.000000	0.000000	0.000000	0.003000	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
alpha-BHC	319846	0.000000	0.000000	0.000005	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Beta-BHC	319857	0.000000	0.000000	0.000017	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
gamma-BHC (Lindane)	58899	0.000000	0.000000	0.000063	0.000950	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Chlordane	57749	0.000000	0.000000	0.000001	0.002400	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
4,4'-DDT	50293	0.000000	0.000000	0.000000	0.001100	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
4,4'-DDE	72559	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
4,4'-DDD	72548	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Dieldrin	60571	0.000000	0.000000	0.000000	0.000240	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Alpha-Endosulfan	959988	0.000000	0.000000	0.000056	0.000220	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Beta-Endosulfan	33213659	0.000000	0.000000	0.000056	0.000220	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Endosulfan sulfate	1031078	0.000000	0.000000	0.089000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Endrin	72208	0.000000	0.000000	0.000036	0.000086	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Endrin aldehyde	7421934	0.000000	0.000000	0.000300	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Heptachlor	76448	0.000000	0.000000	0.000000	0.000520	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Heptachlor epoxide	1024573	0.000000	0.000000	0.000000	0.000520	0.00%	0.00%	No Data	0	None	None	HH Fish	Acute
Polychlorinated Biphenyls (PCBs)		0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Toxaphene	8001352	0.000000	0.000000	0.000000	0.000730	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
1,2,4,5-Tetrachlorobenzene	95943	0.000000	0.000000	0.001100	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2-methyl-4,6-dinitrophenol	534521	0.000000	0.000000	0.280000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
2,4-D	94757	0.000000	0.000000	722,694.133927	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
2,4,5-TP (Silvex)	93721	0.000000	0.000000	30,087.681233	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
2,4,5-trichlorophenol	95954	0.000000	0.000000	3.600000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Asbestos	1332214	0.000000	0.000000	72,269,413.392.694100	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Benzo(b)fluoranthene	205992	0.000000	0.000000	0.000018	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bis(2-chloroethyl)ether	111444	0.000000	0.000000	0.000530	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Bis(chloromethyl)ether	542881	0.000000	0.000000	0.000000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Chloropyrifos	2921882	0.000000	0.000000	0.000041	0.000083	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Chromium (III)	16065831	0.000000	0.000000	0.086180	1.803049	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Chromium (VI)	18540299	0.017700	0.036500	0.011000	0.016000	160.91%	228.13%	DMR	60	Limit	Limit	Chronic	Acute
Demeton	8065483	0.000000	0.000000	0.000100	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Dinitrophenols	25550587	0.000000	0.000000	5.300000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Guthion	86500	0.000000	0.000000	0.000010	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Hexachlorocyclo-hexane-Technical	319868	0.000000	0.000000	0.000041	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Hydrogen Sulfide, Undissociated	7783064	0.000000	0.000000	0.002000	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Malathion	121755	0.000000	0.000000	0.000100	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Methoxychlor	72435	0.000000	0.000000	0.000030	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Mirex	2385855	0.000000	0.000000	0.000001	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Nitrosamines, Other		0.000000	0.000000	0.001240	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosodibutylamine	924163	0.000000	0.000000	0.000220	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosodiethylamine	55185	0.000000	0.000000	0.001240	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
N-Nitrosopyrrolidine	930552	0.000000	0.000000	0.034000	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA

STEADY STATE TOXICS WASTELOAD ALLOCATION MODEL (SSTWAM2004) – REASONABLE POTENTIAL ANALYSIS – OUTFALL 004

<u>Parameter</u>	<u>CAS Number</u>	<u>Reported Discharge (mg/l)</u>		<u>Calculated Effluent Limitations (mg/l)</u>		<u>Reasonable Potential</u>		<u>Data Source</u>	<u>No. of Samples</u>	<u>Effluent Requirement</u>		<u>Justification</u>	
		<u>Average</u>	<u>Maximum</u>	<u>Average</u>	<u>Maximum</u>	<u>Average</u>	<u>Maximum</u>			<u>Average</u>	<u>Maximum</u>	<u>Average</u>	<u>Maximum</u>
Parathion	56382	0.000000	0.000000	0.000013	0.000065	0.00%	0.00%	No Data	0	None	None	Chronic	Acute
Pentachlorobenzene	608935	0.000000	0.000000	0.001500	NA	0.00%	0.00%	No Data	0	None	None	HH Fish	NA
Phthalate esters		0.000000	0.000000	0.003000	NA	0.00%	0.00%	No Data	0	None	None	Chronic	NA
Total Dissolved Solids		0.000000	0.000000	2,256,576,092.465750	NA	0.00%	0.00%	No Data	0	None	None	HH DWS	NA
Tritium		0.000000	0.000000	NA	20,000.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Strontium-90		0.000000	0.000000	NA	8.000000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Uranium		0.000000	0.000000	NA	0.030000	0.00%	0.00%	No Data	0	None	None	NA	Acute
Total Ammonia		0.000000	0.000000	2.678236	17.032201	0.00%	0.00%	No Data	0	None	None	Chronic	Acute

Hardness
 Metal limitations are developed
 using the mixed hardness of the
 effluent and receiving waters

Chronic
 100.00

Acute
 100.00

Toxicity

<u>Type of Test</u>	<u>Maximum</u>	<u>Units</u>	<u>Justification</u>	<u>Percent Effluent</u>
Chronic	1.00	TUc	Chronic	100.00%

KPDES



KENTUCKY POLLUTANT DISCHARGE ELIMINATION SYSTEM

PERMIT

PERMIT NO.: KY0099325
AI NO.: 3046

AUTHORIZATION TO DISCHARGE UNDER THE KENTUCKY POLLUTANT DISCHARGE ELIMINATION SYSTEM

Pursuant to Authority in KRS 224,

James Marine, Inc.
c/o Ronald James
P.O. Box 2305
Paducah, Kentucky 42002-2305

is authorized to discharge from a facility located at

James Marine, Inc. - Paducah River Service
4500 Clarks River Road
Paducah, McCracken County, Kentucky 42003

to receiving waters named

Tennessee River (between River Mile Points 4.9 and 5.2)

in accordance with effluent limitations, monitoring requirements, and other conditions set forth in PARTS I, II, III, and IV hereof. The permit consists of this cover sheet, and PART I 3 pages, PART II 6 page, PART III 1 page, and PART IV 3 pages.

This permit shall become effective on

This permit and the authorization to discharge shall expire at midnight,

Date Signed

Sandra L. Gruzesky, Director
Division of Water

A1. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the term of this permit, the permittee is authorized to discharge from Outfall serial number: 001 - Wash water from dry cargo barge cleaning and repair.

Such discharges shall be limited and monitored by the permittee as specified below:

<u>EFFLUENT CHARACTERISTICS</u>	<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
	(lbs/day)		Other Units(Specify)			
	<u>Monthly</u>	<u>Daily</u>	<u>Monthly</u>	<u>Daily</u>	<u>Measurement</u>	<u>Sample</u>
	<u>Avg.</u>	<u>Max.</u>	<u>Avg.</u>	<u>Max.</u>	<u>Frequency</u>	<u>Type</u>
Flow (MGD)	Report	Report	N/A	N/A	1/Month	Instantaneous
Total Suspended Solids (mg/l)	N/A	N/A	30	45	1/Month	Grab
Oil & Grease (mg/l)	N/A	N/A	10	15	1/Month	Grab
Total Recoverable Iron (mg/l)	N/A	N/A	3.5	4.0	1/Month	Grab
Phosphorus (mg/l)	N/A	N/A	Report	Report	1/Month	Grab
BOD ₅ (mg/l)	N/A	N/A	Report	Report	1/Month	Grab
Hydrogen Sulfide (mg/l)	N/A	N/A	0.002	Report	1/Month	Grab

The pH of the effluent shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 1/Month by grab sample.

There shall be no discharge of floating solids, visible foam, or sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: nearest accessible point prior to discharge to or mixing with the receiving waters.

The abbreviation N/A means Not Applicable.

A2. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning on the effective date of this permit and lasting through the term of this permit, the permittee is authorized to discharge from Outfall serial number: 004 - Bilge water

Such discharges shall be limited and monitored by the permittee as specified below:

<u>EFFLUENT CHARACTERISTICS</u>	<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
	(lbs/day)		Other Units (Specify)		<u>Measurement Frequency</u>	<u>Sample Type</u>
	<u>Monthly Avg.</u>	<u>Daily Max.</u>	<u>Monthly Avg.</u>	<u>Daily Max.</u>		
Flow m ³ /day (MGD)	N/A	N/A	N/A	N/A	1/Month	Instantaneous
Cadmium (Total Recoverable)	N/A	N/A	0.271 µg/l	2.133 µg/l	1/Month	Grab
Chromium (Hexavalent)	N/A	N/A	0.011 mg/l	0.016 mg/l	1/Month	Grab
Total Suspended Solids	N/A	N/A	30 mg/l	45 mg/l	1/Month	Grab
Oil and Grease	N/A	N/A	10 mg/l	15 mg/l	1/Month	Grab
Copper (Total Recoverable)	N/A	N/A	9.329 µg/l	13.999 µg/l	1/Month	Grab
Iron (Total Recoverable)	N/A	N/A	3.5 mg/l	4.0 mg/l	1/Month	Grab
Lead (Total Recoverable)	N/A	N/A	3.182 µg/l	81.645 µg/l	1/Month	Grab
Zinc (Total Recoverable)	N/A	N/A	0.1198 mg/l	0.1198 mg/l	1/Month	Grab
Total Residual Chlorine	N/A	N/A	0.011 mg/l	0.019 mg/l	1/Month	Grab
Benzo(a)anthracene, µg/l	N/A	N/A	Report	Report	1/Month	Grab
Fluoranthene, µg/l	N/A	N/A	Report	Report	1/Month	Grab
2,4-Dimethylphenol, µg/l	N/A	N/A	Report	Report	1/Quarter	Grab
Hardness, (as mg/l CaCO ₃)	N/A	N/A	Report	Report	1/Quarter	Grab

The pH of the effluent shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored 1/Month by grab sample.

There shall be no discharge of floating solids, visible foam, or sheen in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location: nearest accessible point prior to discharge to or mixing with the receiving waters.

The abbreviation N/A means Not Applicable.

PART I
Page I-3
Permit No.: KY0099325
AI No.: 3046

B. Schedule of Compliance

The permittee shall achieve compliance with all requirements on the effective date of this permit.

STANDARD CONDITIONS FOR KPDES PERMIT

This permit has been issued under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits or licenses required by this Cabinet and other state, federal, and local agencies.

It is the responsibility of the permittee to demonstrate compliance with permit parameter limitations by utilization of sufficiently sensitive analytical methods.

The following KPDES permit conditions apply to all discharges authorized by this permit pursuant to 401 KAR 5:065, Section 1.

(1) Duty to comply.

(a) General requirement.

The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of KRS Chapter 224, among which shall be the following remedies: enforcement action, permit revocation, revocation and reissuance, or modification; or denial of a permit renewal application.

(b) Specific duties.

1. The permittee shall comply with effluent standards or prohibitions established under 40 CFR Part 129 as of July 1, 2001, as adopted without change, within the time provided in the federal regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.
2. Any person who violates a permit condition as set forth in the KPDES administrative regulations shall be subject to penalties under KRS 224.99-010(1) and (4).

(2) Duty to reapply.

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee shall apply for and obtain a new permit as required in 401 KAR 5:060, Section 1.

(3) Need to halt or reduce activity not a defense.

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(4) Duty to mitigate.

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

(5) Proper operation and maintenance.

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control and related appurtenances which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also shall include adequate laboratory controls, and appropriate quality assurance procedures. This provision shall require the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only if the operation is necessary to achieve compliance with the conditions of the permit.

(6) Permit actions.

The permit may be modified, revoked and reissued, or revoked for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or a notification of planned changes or anticipated noncompliance, shall not stay any permit condition.

(7) Property rights.

This permit shall not convey any property rights of any kind, or any exclusive privilege.

(8) Duty to provide information.

The permittee shall furnish to the cabinet, within a reasonable time, any information which the cabinet may request to determine whether cause exists for modifying, revoking and reissuing, or revoking this permit, or to determine compliance with this permit. The permittee shall also furnish to the cabinet, upon request, copies of records required to be kept by this permit.

(9) Inspection and entry.

The permittee shall allow the cabinet, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records pertinent to the KPDES program are or may be kept;
- (b) Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment, including monitoring and control equipment, practices, or operations regulated or required under this permit; and
- (d) Sample or monitor at reasonable times, for the purposes of assuring KPDES program compliance or as otherwise authorized by KRS Chapter 224, any substances or parameters at any location.

(10) Monitoring and records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
- (b) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, or application. This period may be extended by request of the cabinet at any time.
- (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The individuals who performed the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The individuals who performed the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of the analyses.
- (d) Monitoring shall be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in the permit.
- (e) Any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under the permit shall, upon conviction, be subject to penalties under KRS 224.99-010(4).

(11) Signatory requirement.

All applications, reports, or information submitted to the cabinet shall be signed and certified as indicated in 401 KAR 5:060, Section 9. Any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be subject to penalties under KRS 224.99-010(4).

(12) Reporting requirements.

(a) Planned changes.

The permittee shall give notice to the cabinet as soon as possible of any planned physical alteration or additions to the permitted facility. Notice shall be required only if:

1. The alteration or addition to a permitted facility may meet one (1) of the criteria for determining whether a facility is a new source in 401 KAR 5:080, Section 5; or
2. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification only applies to pollutants which are subject either to effluent limitations in the permit, or to notification requirements under 401 KAR 5:080, Section 5.

(b) Anticipated noncompliance.

The permittee shall give advance notice to the cabinet of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

(c) Transfers.

The permit shall not be transferable to any person except after notice to the cabinet. The cabinet may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate other requirements as may be necessary under KRS Chapter 224.

(d) Monitoring reports.

Monitoring results shall be reported at the intervals specified in the permit. Monitoring results shall be reported as follows:

1. Monitoring results shall be reported on a Discharge Monitoring Report (DMR).
2. If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR Part 136 or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.
3. Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the cabinet in the permit.

(e) Compliance schedules.

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date.

(f) Twenty-four (24) hour reporting.

The permittee shall follow the provisions of 401 KAR 5:015 and shall orally report any noncompliance which may endanger health or the environment, within twenty-four (24) hours from the time the permittee becomes aware of the circumstances. This report shall be in addition to and not in lieu of any other reporting requirement applicable to the noncompliance. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The cabinet may waive the written report on a case-by-case basis if the oral report has been received within twenty-four (24) hours. The following shall be included as events which shall be reported within twenty-four (24) hours:

1. Any unanticipated bypass which exceeds any effluent limitation in the permit, as indicated in subsection (13) of this section.
2. Any upset which exceeds any effluent limitation in the permit.
3. Violation of a maximum daily discharge limitation for any of the pollutants listed by the cabinet in the permit to be reported within twenty-four (24) hours, as indicated in Section 2(7) of this administrative regulation.

(g) Other noncompliance.

The permittee shall report all instances of noncompliance not reported under paragraphs (d), (e), and (f) of this subsection, when monitoring reports are submitted. The reports shall contain the information listed in paragraph (f) of this subsection.

(h) Other information.

Where the permittee becomes aware that it failed to submit any relevant fact in a permit application, or submitted incorrect information in a permit application or in any report to the cabinet, it shall promptly submit these facts or information.

(13) Occurrence of a bypass.

(a) Bypass not exceeding limitations.

The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. This type of bypass shall not be subject to the provisions of paragraphs (b) and (c) of this subsection.

(b) Notice.

1. Anticipated bypass.

If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten (10) days before the date of the bypass. Compliance with this requirement constitutes compliance with 401 KAR 5:015, Section 1.

2. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in subsection (12)(f) of this section, twenty-four (24) hour notice. Compliance with this requirement constitutes compliance with 401 KAR 5:015, Section 4.

(c) Prohibition of a bypass.

1. Bypassing shall be prohibited, and the cabinet may take enforcement action against a permittee for bypass, unless:
 - a. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - b. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition shall not be satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 - c. The permittee submitted notices as required under paragraph (b) of this subsection.
2. The cabinet may approve an anticipated bypass, after considering its adverse effects, if the cabinet determines that it will meet the three (3) conditions listed in subparagraph 1a, b, and c of this paragraph.

(14) Occurrence of an upset.

(a) Effect of an upset.

An upset constitutes an affirmative defense to an action brought for noncompliance with technology-based permit effluent limitations if the requirements of paragraph (b) of this subsection are met.

(b) Conditions necessary for a demonstration of an upset.

A permittee who wishes to establish the affirmative defense of upset shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An upset occurred and that the permittee can identify the causes of the upset;
2. The permitted facility was at the time being properly operated;
3. The permittee submitted notice of the upset as required in subsection (12)(f) of this section; and
4. The permittee complied with any remedial measures required under subsection (4) of this section.

(c) Burden of proof.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset shall have the burden of proof.

PART III

OTHER REQUIREMENTS

A. Reporting of Monitoring Results

Monitoring results obtained during each monitoring period must be reported on a preprinted Discharge Monitoring Report (DMR) Form that will be mailed to you. The completed DMR for each monitoring period must be sent to the Division of Water at the address listed below (with a copy to the appropriate Regional Office) postmarked no later than the 28th day of the month following the monitoring period for which monitoring results were obtained.

Division of Water
Paducah Regional Office
130 Eagle Nest Drive
Paducah, Kentucky 42003
ATTN: Supervisor

Division of Water
Surface Water Permits Branch
Permit Support Section
200 Fair Oaks Lane
Frankfort, Kentucky 40601

B. Reopener Clause

This permit shall be modified, or alternatively revoked and reissued, to comply with any applicable effluent standard or limitation issued or approved under 401 KAR 5:050 through 5:086, if the effluent standard or limitation so issued or approved:

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. Controls any pollutant not limited in the permit.

The permit as modified or reissued under this paragraph shall also contain any other requirements of KRS Chapter 224 when applicable.

C. Outfall Signage

The permittee shall post a permanent marker at all discharge locations and/or monitoring points. The marker shall be at least 2 feet by 2 feet in size and a minimum of 3 feet above ground level with the Permittee Name and KPDES permit and outfall numbers in 2 inch letters. For internal monitoring points the marker shall be of sufficient size to include the outfall number in 2 inch letters and shall be posted as near as possible to the actual sampling location.

PART IV

BEST MANAGEMENT PRACTICES

SECTION A. GENERAL CONDITIONS

1. Applicability

These conditions apply to all permittees who use, manufacture, store, handle, or discharge any pollutant listed as: (1) toxic under Section 307(a)(1) of the Clean Water Act; (2) oil, as defined in Section 311(a)(1) of the Act; (3) any pollutant listed as hazardous under Section 311 of the Act; or (4) is defined as a pollutant pursuant to KRS 224.01-010(35) and who have ancillary manufacturing operations which could result in (1) the release of a hazardous substance, pollutant, or contaminant, or (2) an environmental emergency, as defined in KRS 224.01-400, as amended, or any regulation promulgated pursuant thereto (hereinafter, the "BMP pollutants"). These operations include material storage areas; plant site runoff; in-plant transfer, process and material handling areas; loading and unloading operations, and sludge and waste disposal areas.

2. BMP Plan

The permittee shall develop and implement a Best Management Practices (BMP) plan consistent with 401 KAR 5:065, Section 2(10) pursuant to KRS 224.70-110, which prevents or minimizes the potential for the release of "BMP pollutants" from ancillary activities through plant site runoff; spillage or leaks, sludge or waste disposal; or drainage from raw material storage. A Best Management Practices (BMP) plan will be prepared by the permittee unless the permittee can demonstrate through the submission of a BMP outline that the elements and intent of the BMP have been fulfilled through the use of existing plans such as the Spill Prevention Control and Countermeasure (SPCC) plans, contingency plans, and other applicable documents.

3. Implementation

If this is the first time for the BMP requirement, then the plan shall be developed and submitted to the Division of Water within 90 days of the effective date of the permit. Implementation shall be within 180 days of that submission. For permit renewals the plan in effect at the time of permit reissuance shall remain in effect. Modifications to the plan as a result of ineffectiveness or plan changes to the facility shall be submitted to the Division of Water and implemented as soon as possible.

4. General Requirements

The BMP plan shall:

- a. Be documented in narrative form, and shall include any necessary plot plans, drawings, or maps.
- b. Establish specific objectives for the control of toxic and hazardous pollutants.
 - (1) Each facility component or system shall be examined for its potential for causing a release of "BMP pollutants" due to equipment failure, improper operation, natural phenomena such as rain or snowfall, etc.

- (2) Where experience indicates a reasonable potential for equipment failure (e.g., a tank overflow or leakage), natural condition (e.g., precipitation), or other circumstances which could result in a release of "BMP pollutants," the plan should include a prediction of the direction, rate of flow, and total quantity of the pollutants which could be released from the facility as result of each condition or circumstance.
- c. Establish specific Best Management Practices to meet the objectives identified under paragraph b of this section, addressing each component or system capable of causing a release of "BMP pollutants."
- d. Include any special conditions established in part b of this section.
- e. Be reviewed by plant engineering staff and the plant manager.

5. Specific Requirements

The plan shall be consistent with the general guidance contained in the publication entitled "NPDES Best Management Practices Guidance Document," and shall include the following baseline BMPs as a minimum.

- a. BMP Committee
- b. Reporting of BMP Incidents
- c. Risk Identification and Assessment
- d. Employee Training
- e. Inspections and Records
- f. Preventive Maintenance
- g. Good Housekeeping
- h. Materials Compatibility
- i. Security
- j. Materials Inventory

6. SPCC Plans

The BMP plan may reflect requirements for Spill Prevention Control and Countermeasure (SPCC) plans under Section 311 of the Act and 40 CFR Part 151, and may incorporate any part of such plans into the BMP plan by reference.

7. Hazardous Waste Management

The permittee shall assure the proper management of solid and hazardous waste in accordance with the regulations promulgated under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1978 (RCRA) (40 U.S.C. 6901 et seq.) Management practices required under RCRA regulations shall be referenced in the BMP plan.

8. Documentation

The permittee shall maintain a description of the BMP plan at the facility and shall make the plan available upon request to NREPC personnel. Initial copies and modifications thereof shall be sent to the following addresses when required by Section 3:

Division of Water
Paducah Regional Office
130 Eagle Nest Drive
Paducah, Kentucky 42003
ATTN: Supervisor

Division of Water
Surface Water Permits Branch
Permit Support Section
200 Fair Oaks Lane
Frankfort, Kentucky 40601

9. BMP Plan Modification

The permittee shall amend the BMP plan whenever there is a change in the facility or change in the operation of the facility which materially increases the potential for the ancillary activities to result in the release of "BMP pollutants."

10. Modification for Ineffectiveness

If the BMP plan proves to be ineffective in achieving the general objective of preventing the release of "BMP pollutants," then the specific objectives and requirements under paragraphs b and c of Section 4, the permit, and/or the BMP plan shall be subject to modification to incorporate revised BMP requirements. If at any time following the issuance of this permit the BMP plan is found to be inadequate pursuant to a state or federal site inspection or plan review, the plan shall be modified to incorporate such changes necessary to resolve the concerns.

SECTION B. SPECIFIC CONDITIONS

N/A